



Brett D. Watson, SBN: 203183
E-Mail: bwatson@pdlawyers.com
Chetna Vora, SBN: 223311
E-Mail: cvora@pdlawyers.com
PALMER, LOMBARDI & DONOHUE LLP
515 South Flower Street, Suite 2100
Los Angeles, California 90071
Phone: (213) 688-0430
Fax: (213) 688-0440

Attorneys for Defendant MUFG Union Bank, N.A.

11/6/2015

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KATHLEEN MAGEE,

Plaintiff,

vs.

EXPERIAN INFORMATION
SOLUTIONS, INC., ET AL.,

Defendants.

Case No. 15-cv-04258-EJD

[Honorable Edward J. Davila]

**REQUEST AND STIPULATION TO
CONTINUE DATE FOR
DEFENDANT MUFG UNION BANK,
N.A.'S RESPONSE TO PLAINTIFF'S
COMPLAINT**

[New Response Date for Defendant
MUFG Union Bank, N.A.: November 16
2015]

Action Filed: August 4, 2015

TO THE UNITED STATES DISTRICT COURT FOR THE NORTHERN
DISTRICT OF CALIFORNIA, ALL PARTIES AND THEIR ATTORNEYS OF
RECORD:

Defendant MUFG Union Bank, N.A. ("Union Bank") and Plaintiff Kathleen
Magee ("Magee") are actively discussing settlement of this case but need additional
time to determine whether they can avoid further pleadings through settling the
action or whether a response will be necessary.

Magee filed her Complaint in state court on August 4, 2015. Defendant
Experian Information Solutions removed this case to federal court on or around

1 September 18, 2015. Magee and Union Bank stipulate that Union Bank has up to
2 and including November 16, 2015 to respond to the Complaint. This extension will
3 not alter any Court set dates. Union Bank has not waived any objection to the venue
4 or to the jurisdiction of the court over the person of the defendant, or any other
5 challenge to the Complaint or other pleadings in this case.

6
7 DATED: November 5, 2015

8 By /s/ Brett D. Watson
9 BRETT D. WATSON
10 CHETNA VORA
11 PALMER, LOMBARDI & DONOHUE LLP
Attorneys for Defendant MUFG Union
Bank, N.A.

12 DATED: November 5, 2015

13 By /s/ Elliot Gale
14 ELLIOT GALE
15 SAGARIA LAW P.C.
Attorneys for Plaintiff Kathleen Magee

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Los Angeles, California 90071